

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ROBERT STOUD,	:	
	:	
Plaintiff	:	CIVIL ACTION - LAW
	:	
v.	:	
	:	
SUSQUEHANNA COUNTY,	:	NO. 3:17-CV-2183-MEM
	:	
Defendant	:	

JOINT MOTION FOR EXTENSION OF TIME FOR EXPERT REPORTS AND  
TO FILE DISPOSITIVE MOTIONS

Defendant, Susquehanna County, through its attorneys, Kreder Brooks Hailstone LLP, in concurrence with the Plaintiff, hereby requests the Court to extend the deadline to file dispositive motions to November 19, 2018 and extend the deadlines for expert reports for thirty days, and cite the following reasons, therefore:

1. Currently, dispositive motions are due November 9, 2018.

2. During his deposition, Plaintiff requested that he be allowed to review the transcript before it is finalized.
3. The transcript was supplied to him on October 19, 2018, giving him 30 days to review and provide a corrected copy.
4. Defendant requests that the deadline for filing of Dispositive Motions be extended to November 21, 2018, which will give the Plaintiff ample time to review the transcript and provide any corrections he believes necessary.
5. Plaintiff concurs in this request.
6. Additionally, Plaintiff's expert reports were also due on November 9, 2018.
7. Based on the request for extension of the dispositive Motion deadline, Plaintiff requests that the experts report deadlines be extended by 30 days.
8. Defendant concurs in this request.
9. The requested extensions will not unreasonably delay trial.

WHEREFORE, it is respectfully requested that the Court extend the deadline for the filing of Dispositive Motions to November 21, 2018 and the deadline for expert reports from Plaintiff to December 10, 2018, from the Defendant January 10, 2019; and supplementations, if any, by Plaintiff to February 11, 2019 and by the Defendant to March 11, 2019.

KREDER BROOKS HAILSTONE LLP

By /s/A. James Hailstone  
A. James Hailstone  
Attorney for Defendant

CERTIFICATE OF CONCURRENCE

I, A. James Hailstone, hereby certify that I contacted Plaintiff's counsel in accordance with the Local Rules to determine whether he would concur in the attached Motion. Plaintiff's counsel concurs with the attached Motion.

KREDER BROOKS HAILSTONE LLP

220 Penn Avenue, Ste 200  
Scranton, PA 18503

/s/A. James Hailstone

A. James Hailstone  
Attorney I.D. #80055  
Attorneys for Defendant

CERTIFICATE OF SERVICE

AND NOW, this 8<sup>th</sup> day of November, 2018, A. James Hailstone, a member of the firm of Kreder Brooks Hailstone LLP, electronically filed the foregoing Motion with the Clerk of the United States District Court for the Middle District of Pennsylvania using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail address(es):

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